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9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 2017 SUBARU WRX STI LIMITED,
16 VIN: JFIVA2Z62H9803217,
17 WASHINGTON LICENSE PLATE
18 CNA8447,

19 Defendant.

20 VERIFIED COMPLAINT FOR
21 FORFEITURE *IN REM*

22 Plaintiff, United States of America, by its attorneys, Vanessa R. Waldref,
23 United States Attorney for the Eastern District of Washington, and Brian M. Donovan,
24 Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance
25 with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

26 **I. NATURE OF THE ACTION**

27 1. This is an action to forfeit and condemn to the use and benefit of the
28 United States of America the above-captioned Defendant Property seized by the Drug
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1 Enforcement Administration for violations of Title II of the Controlled Substances
2 Act, 21 U.S.C. § 801 et seq.

3
4 **II. THE DEFENDANT(S) *IN REM***

5 2. The Defendant Property consists of the following property:
6 2017 Subaru WRX STI Limited, VIN: JFIVA2Z62H9803217,
7 Washington License Plate CNA8447
8 (hereafter “the Defendant Property”)
9

10 **III. JURISDICTION AND VENUE**

11 3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn
12 the Defendant Property. This Court has jurisdiction over an action commenced by the
13 United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28
14 U.S.C. § 1355(a). This Court has *in rem* jurisdiction over the Defendant Property
15 under 28 U.S.C. § 1355(b).
16

17 4. Upon the filing of this complaint, Plaintiff requests that the Court issue
18 an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which Plaintiff will
19 execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule
20 G(3)(c).
21

22 5. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1),
23 because the acts or omissions giving rise to the forfeiture occurred in this district.
24

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28

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1 **IV. BASIS FOR FORFEITURE**

2 6. Plaintiff repeats and re-alleges each and every allegation set forth in
3
4 Paragraphs 1 through 5 above.

5 7. The Defendant Property is liable to condemnation and forfeiture to the
6 United States for its use in accordance with the provisions of 21 U.S.C. § 881(a)(4)
7 because it constitutes property used or intended to be used to commit or facilitate
8 violations of the Controlled Substance Act and in accordance with the provisions of
9 21 U.S.C. § 881(a)(6), because it constitutes: 1) money, negotiable instruments,
10 securities and other things of value furnished and intended to be furnished in exchange
11 for a controlled substance in violation of the Controlled Substances Act; 2) proceeds
12 traceable to such an exchange; and/or 3) money, negotiable instruments, and securities
13 used and intended to be used to facilitate a violation of the Controlled Substances Act.
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17 **V. FACTS**

18 Investigation

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20 8. In April 2024, DEA Tri-Cities Resident Office (“TCRO”) began
21 investigating Kenneth Richard ROWELL (“ROWELL”) based on information
22 provided by a Spokane Police Department (“SPD”) Confidential Human Source
23 (herein referred to as CS-1). ROWELL was identified as a bulk poly-drug distributor
24 operating in the Eastern District of Washington. Text messages between CS-1 and
25 ROWELL from March/April 2024 discovered messages indicating ROWELL
26
27
28 VERIFIED COMPLAINT FOR FORFEITURE *IN REM* -3

1 frequently utilized vehicles to facilitate illegal drug trafficking. CS-1 knew ROWELL
2 utilized several different vehicles, including a BMW, a Mercedes-Benz, and a red
3 Subaru WRX (later confirmed to be the Defendant Property).
4

5 9. In July 2024, DEA TCRO learned ROWELL had an active arrest warrant
6 through the United States Marshals Service (“USMS”) for a probation violation. On
7 July 15, 2024, the USMS executed the arrest warrant for ROWELL at his residence,
8 located at 1831 W. Henry St., Pasco, WA. At the time of ROWELL’s arrest, the
9 Defendant Property was parked in the front lawn of the residence.
10

11 10. While clearing and securing the residence to effect ROWELL’s arrest,
12 the USMS observed large amounts of illegal drugs, which led to the DEA TRCO
13 obtaining a search warrant for the residence. During the search of the residence, DEA
14 TCRO seized approximately 15,000 Fentanyl pills, approximately 60 grams of
15 Heroin, approximately 17 grams of Methamphetamine, approximately 700 grams of
16 Cocaine, and items associated to illegal drug use and distribution, to include glass
17 pipes digital scales with drug residue. DEA TCRO also seized \$4,461 in US Currency
18 from ROWELL’s bedroom.
19

20 11. During a post-Miranda interview, ROWELL confirmed the illegal drugs
21 found inside his residence belonged to him and admitted distributing large quantities
22 of illegal drugs.
23

24 //
25

Use of Multiple Vehicles Registered to Others

12. Throughout the course of the investigation, DEA TCRO surveillance observed multiple vehicles at ROWELL's residence, located at 1831 W. Henry St., Pasco, WA.

13. On April 17, 2024, a 2014 Mercedes-Benz E350 bearing Washington Plate CGM9417 (herein referred to as the 2014 Mercedes) was observed at ROWELL's residence. At the onset of the investigation, the 2014 Mercedes was registered to ROWELL, but on approximately June 24, 2024, it was transferred and registered to his daughter, Kayla Jean ROWELL ("K. ROWELL").

14. On April 22, 2024, a 2007 Mercedes-Benz CLS550 bearing Washington Plate CLR1743 (herein referred to as the 2007 Mercedes) was observed at ROWELL's residence. At the onset of the investigation, the 2007 Mercedes was registered to Nicole CASCH, who is a suspected criminal associate and paramour of ROWELL. Sometime in June/July 2024, the 2007 Mercedes was transferred and registered to Caitlyn Dee STRATTON ("STRATTON"), who is another paramour and suspected criminal associate of ROWELL. DEA TCRO surveillance observed ROWELL utilizing this vehicle during the course of the investigation.

15. On May 21, 2024, a 2008 BMW 335 bearing Washington Plate CLR1308 (herein referred to as the 2008 BMW) was observed at ROWELL's residence. The vehicle was registered to K. ROWELL. DEA TCRO surveillance observed ROWELL

1 utilizing this vehicle during the course of the investigation to travel to an apartment
2 utilized by CASCH.

3
4 16. It is a known tactic for drug traffickers to register vehicles in the names
5 of other individuals, especially family members or close associates, to avoid detection
6 and insulate assets from seizure.

7
8 ROWELL's Use of the Defendant Property

9 17. Throughout the course of the investigation, DEA TCRO observed
10 ROWELL operating the Defendant Property on multiple occasions. The Defendant
11 Property was also frequently observed at ROWELL's residence, indicating it was one
12 of his primary vehicles.

13
14 18. On April 17, 2024, the Defendant Property was observed bearing
15 Washington Plate CLB0273, and was registered to ROWELL, at 11720 Pheasant Run
16 Rd., Pasco, WA. On approximately June 24, 2024, it was transferred and registered to
17 his daughter, K. ROWELL, at 1831 W. Henry St., Pasco, WA. At the time of seizure,
18 it displayed Washington Plate CNA8447.

19
20 19. Data obtained from court-authorized forensic downloads of cellular
21 phones seized from ROWELL disclosed text messages between ROWELL and K.
22 ROWELL indicating K. ROWELL's primary vehicle was the 2014 Mercedes and
23 ROWELL's primary vehicle was the Defendant Property. The data also identified
24
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28

1 multiple conversations between ROWELL and other individuals referencing drug
2 transactions conducted by ROWELL¹.

3
4 20. The data also contained multiple saved videos from ROWELL's home
5 security system, which showed ROWELL utilizing the Defendant Property after the
6 date it was registered to K. ROWELL. The videos did not show anyone else utilizing
7 the Defendant Property.
8

9 ROWELL's Criminal History

10 21. ROWELL's criminal history includes the following drug-related
11 convictions:
12

13 2000: Manufacture/Deliver/Possession with Intent
14 2002: Possess Psilocybin
15 2003: Possess Marijuana, Possess Methamphetamine
16 2004: Possess Marijuana
17 2009: Possess Methamphetamine
18 2013: Possess Methamphetamine, Distribution of Methamphetamine
19 2014: Possession of Methamphetamine with Intent to Deliver

20 Washington State Employment Records

21 22. The Washington State Employment Security Department reported the
22 following wages for ROWELL:

23 2023Q4: \$975.00
24 2023Q3: \$810.00
25 2023Q2: \$930.00

26 ¹ ROWELL was vague in his text message communication and often referenced
27 "meeting" with people at various locations. Based on the totality of this investigation,
28 it is believed these were drug transactions, although not explicitly stated by
ROWELL.

1 2023Q1: \$360.00
2 2022Q4: \$120.00
3 2022Q3: \$605.00
4 2022Q2: \$6,230.00
5 2022Q1: \$10,014.38
6 2021Q4: \$5,282.93

7 23. The Washington State Department of Revenue identified ROWELL as
8 the sole governor or KRR Services, LLC, which documented the business produced
9 \$225.00 in retailing and \$750.00 in wholesale during 2023. A Business License
10 Renewal Application filed on September 7, 2023, disclosed KRR Services, LLC had
11 the following gross annual income for the previous 12 months:

12 Benton City: \$2,000.00
13 Kennewick: \$10,000.00
14 Pasco: \$7,000.00

15 *Seizure of the Defendant Property*

16 24. The Defendant Property was seized on July 15, 2024, during the search
17 of ROWELL's residence, where it was parked in the front yard. ROWELL consented
18 to a search of the Defendant Property which did not identify any illegal drugs,
19 firearms, or US Currency.
20

21 25. On October 8, 2024, K. ROWELL filed a claim in DEA's administrative
22 forfeiture action for the Defendant Property indicating it was a graduation gift from
23 her father, ROWELL.
24

25 26. On December 10, 2024, DEA TCRO interviewed K. ROWELL and her
26 grandfather, Howard Alfred ROWELL ("H. ROWELL") about the Defendant
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28

1 Property. K. ROWELL was informed of the investigation into ROWELL, the items
2 seized from ROWELL's residence on July 15, 2024, and that DEA TCRO was aware
3 ROWELL was gifting vehicles to individuals that were purchased with illegitimate
4 proceeds from illegal drug activity. Following the interview, K. ROWELL indicated
5 she would withdraw her claim to the Defendant Property².
6

7
8 Facts Supporting Seizure

9 27. There is probable cause to believe the Defendant Property was purchased
10 with illegitimate proceeds from illegal drug activity. The Washington State
11 Employment Records for ROWELL indicated he had no reported income in 2024, and
12 less than \$4,000 income in 2023, which was not nearly enough to afford the
13 Defendant Property, ROWELL's lifestyle, or the assets he was transferred to others,
14 including K. ROWELL. ROWELL relied on his involvement in illegal drug
15 trafficking support his lifestyle and this purchase of the Defendant Property.
16

17 28. Additionally, K. ROWELL did not purchase the Defendant Property
18 with her own money nor was she making payments to ROWELL for the asset.
19

20 29. Lastly, K. ROWELL has three other vehicles that were gifted to her by
21 ROWELL that were not targeted for seizure. Seizure of the Defendant Property, which
22 was purchased with illegitimate drug proceeds and utilized to facilitate drug
23 trafficking, provides no hardship to K. ROWELL.
24
25
26

27 ² At the time this complaint was filed, K. ROWELL had not withdrawn her claim to
28 the Defendant Property

1 **VI. CONCLUSION**

2 WHEREFORE, Plaintiff requests that the Clerk of the Court issue a warrant for
3 the arrest of the Defendant Property; that notice of this action be given to all persons
4 who reasonably appear to be potential claimants of interests in the property; that the
5 Defendant Property be forfeited and condemned to the United States of America; that
6 Plaintiff be awarded its costs and disbursements in this action and for such other and
7 further relief as this Court deems proper and just.
8

9 DATED this 6th day of January 2025.

10
11
12 Vanessa R. Waldref
13 United States Attorney

14 s/ Brian M. Donovan
15 Brian M. Donovan
16 Assistant United States Attorney

17 VERIFICATION

18 I, Benjamin S. LaMothe, hereby verify and declare under penalty of perjury that
19 I am a Special Agent with the Drug Enforcement Administration in Richland,
20 Washington, that I have read the foregoing Verified Complaint *in rem* and know the
21 contents thereof, and that the matters contained in the Verified Complaint are true to
22 my own knowledge, except those matters herein stated to be alleged on information
23 and belief, and as to those matters I believe them to be true.
24

25 The sources of my knowledge and information and the grounds of my belief are
26 the official files and records of the United States and information supplied to me by
27
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1 other law enforcement officers, as well as my investigation of this case, together with
2 others, as a Special Agent.

3
4 I hereby verify and declare under penalty of perjury that the foregoing
5 information is true and correct.

6 DATED this 6th day of January 2025.

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9

Benjamin S. LaMothe, Special Agent
Drug Enforcement Administration